

Date/Dyddiad: 6 February 2018
Ask for/Gofynnwch am: Leader
Telephone/Rhif ffôn: 01446 709469
Fax/Ffacs:
Your Ref/Eich Cyf:
My Ref/Cyf: JWT/JCC/S18/8327
e-mail/e-bost:

The Vale of Glamorgan Council
Civic Offices, Holton Road, Barry, CF63 4RU
Tel/Ffôn: (01446) 700111
Textphone/Ffôn Testun: (01446) 741219
Cyngor Bro Morgannwg
Swyddfeydd Dinesig, Heol Holton, Y Barri CF63 4RU
www.valeofglamorgan.gov.uk



Lesley Griffiths AM,
Cabinet Secretary for Energy, Planning and Rural Affairs
Welsh Government
Cardiff Bay
Cardiff
CF99 1NA

Dear Cabinet Secretary,

INVITATION TO PREPARE JOINT LOCAL DEVELOPMENT PLANS AND STRATEGIC DEVELOPMENT PLANS

We refer to your letter of 13 December 2017 regarding the above matter and your invitation for proposals to be brought forward to prepare Strategic Development Plans.

We can advise that your letter was discussed at length at a recent Cardiff Capital Region Cabinet Briefing and we are corresponding to you to reflect the discussion that was held at that briefing. We are also seeking an urgent meeting to discuss this important issue with you at the earliest opportunity.

Firstly, we must advise that your letter came without warning and was somewhat counterproductive in the current context within which we are operating in South East Wales. Various officers from the region have been in discussion with your officials in the hope of obtaining an agreement as to the most appropriate way of working towards preparing a Strategic Development Plan (SDP) in the context of the current suite of Local Development Plans (LDP's) and your work in producing a National Development Framework (NDF). I am aware that our officers have offered to assist your officials in preparing the South East Wales chapter of the National Development Framework. Meanwhile, significant work has been undertaken by officers at each Local Planning Authority to consider the best way forward to achieve meaningful and successful plan coverage in their area and across the region to support the delivery of the City Deal and provide the wider land use planning framework for the region.

We welcome your recognition that now is a time to pause and reflect on the correct path to take to maintain effective development plan coverage ahead of adoption of a SDP.

We are pleased to advise you that at the recent briefing there was consensus amongst all 10 Leaders in the Cardiff Capital Region in support of the principle of a SDP for the region. Whilst the decision to work towards a SDP is a matter for each of the 10 Councils, we are confident that this is a decision which can be taken quickly. It is also relevant that the South East Wales Strategic Planning Group (SEWSPG) has already made significant progress on joint working, and prepared agreed methodologies for LDP / SDP evidence base. This demonstrates a real commitment from those officers at the 'coal face' to work together to share best practice and expertise and avoid duplication or inconsistencies between us. This is the start of coming together to prepare the SDP for the region and something we are keen to build on.

Notwithstanding the consensus that exists to prepare a SDP, there are also significant concerns that remain, which we set out in the remainder of this letter.

There is a consensus amongst all 10 Local Authorities in the Cardiff Capital Region that it would be a mistake to undertake joint LDPs on the footprints proposed in your letter at this stage. The arguments against such an approach are set out below.

Firstly, it would take considerable time and effort to establish the joint working at the sub-regional level necessary to facilitate joint LDPs (i.e. setting up joint LDP teams, governance arrangements, Joint Planning Boards etc.) and this would delay plan preparation for those LPAs who wish to proceed with reviewing their existing LDPs in the short term. Furthermore, it would be a significant distraction from the agreed goal of establishing joint regional working arrangements and governance to facilitate preparation of the SDP. The two processes may work against each other and at the very least would be a duplication of effort. On the other hand, the preparation of Joint LDPs which rely on each LA approving them via full Council presents significant risk to those involved (as was the case with the only joint LDP prepared to date for Gwynedd / Anglesey).

Secondly, it is clear from discussions that our chief planning officers have had with your officials that there was no evidence or analysis undertaken to identify the sub-regional groupings proposed in terms of planning outcomes or the benefits of alternative approaches such as preparing individual plans 'jointly' with the development of shared evidence bases and methodologies. It is clear that your groupings are simply geographical clusters with a single commonality; that being their Local Development Plan expiry / review dates. Notably, 3 Local Authorities in the region have been excluded (even from the invitation) apparently because of their longer plan expiry dates (Cardiff and Vale) or because they have already made some progress on their LDP review (Merthyr Tydfil). We would strongly contend that this does not provide a strong foundation for regional working and is extremely unlikely to provide the best

planning outcomes for the region. In contrast, joint working across the whole region would allow for more successful outcomes where there are shared land-use planning issues. These issues are best understood and provided for through the preparation of the SDP which can address issues across the region, with light touch LDPs addressing more 'local' issues.

Thirdly, there appears limited understanding of the resource implications of progressing the SDP alongside the preparation of LDPs/ joint LDPs, with assumptions having been made about those Local Authorities not progressing an LDP review or joint LDP having sufficient resources to progress the SDP on behalf of the rest. These decisions about resources should be made by those Local Authorities involved and not imposed by Welsh Government.

It is understood from your officials that the Welsh Government's goals are twofold: 1) early progress on the SDP, and 2) full plan coverage. We believe the best way to meet these goals is to enable us to proceed with the SDP immediately, whilst necessary measures are taken by Welsh Government to enable the existing plans to provide the necessary LDP coverage in the region post 2021. We consider that those Councils that consider it necessary to proceed to review / replace their LDPs, should be allowed to do so individually or jointly as they see fit in order to best respond to local issues. Those Councils who do not face similar pressures, should be allowed time to progress work on the SDP and light touch LDPs. In this regard, it would be both helpful and pragmatic if you would agree to remove the plan expiry rule where there is clear evidence that plan coverage preparation is being made (in the way set out above).

In conclusion, we welcome your statement that the right planning system is critical in delivering the objectives of the National Strategy: Prosperity for All and that this includes ensuring better LDPs and SDPs are produced in the future. However, we do not believe short-term joint LDPs are the answer and we feel we are extremely well placed to deliver the right planning system through a meaningful and timely SDP accompanied by a suite of appropriate LDPs (prepared individually or jointly based on planning outcomes and the needs and desires of our communities). We therefore ask your support to enable us to deliver this.

Finally, we would also like to take this opportunity to reiterate the concerns expressed by Local Planning Authorities across Wales about the acknowledged weaknesses in the housing land availability monitoring process as defined in TAN1. Within the first generation Local Development Plans, most Local Planning Authorities in SE Wales reflected the high household projection figures that were produced by Welsh Government in 2003, 2006 and 2008. As such these plans have relatively high growth figures embedded within them. However since 2008 the completion rates in SE Wales have fallen as a consequence of the economic downturn. Ongoing pressure to ensure a 5-year land supply will undoubtedly encourage LPAs to set lower housing targets in the next generation of LDPs, in order to ensure that the 5-year land supply can be maintained over the plan period. This will result in less land being identified for housing in LDPs and less land being genuinely available for housing, which

runs contrary to the City Region's aspirations for growth and our shared desire to build more homes (including affordable homes) in SE Wales. We will monitor with keen interest how the recommendations contained in the Arcadis Report are reflected in the review of Planning Policy Wales and the forthcoming revisions of the Development Plan Manual.

We look forward to meeting with you urgently, so that we can discuss this important issue in the context of the City Deal for the Cardiff Capital Region. We would also ask for your considered response to the matters raised above and hope that we can move forward in a positive manner with your support.

Yours sincerely,

A handwritten signature in black ink that reads "John Thomas". The signature is written in a cursive style with a large initial 'J'.

Councillor John Thomas, Leader, Vale of Glamorgan Council

A handwritten signature in black ink that reads "A. Morgan". The signature is written in a cursive style.

Councillor Andrew Morgan, Leader, Rhondda Cynon Taf County Borough Council

A handwritten signature in blue ink that reads "D. V. Poole". The signature is written in a cursive style.

Councillor David Poole, Leader, Caerphilly County Borough Council